

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff-Intervenor,

– v. –

COUNTRYWIDE HOME LOANS, INC.,
COUNTRYWIDE FINANCIAL
CORPORATION, COUNTRYWIDE BANK,
FSB, BANK OF AMERICA
CORPORATION, BANK OF AMERICA,
N.A., and REBECCA MAIRONE

Defendants.

Case No. 12-cv-1422 (JSR)

**DECLARATION OF ENU MAINIGI IN SUPPORT OF
THE ENTITY DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

I, Enu A. Mainigi, declare as follows:

1. I am admitted *pro hac vice* to the Bar of this Court and am an attorney at the law firm of Williams & Connolly LLP, counsel for Bank of America Corporation and Bank of America, N.A. in the above-captioned action. I submit this declaration in support of Defendants' Memorandum in Support of Motion for Summary Judgment.

2. Attached as Exhibit 1 is a true and correct copy of the transcript of the deposition of Patrick Aliano.

3. Attached as Exhibit 2 is a true and correct copy of the transcript of the deposition of Neal Ballance.

4. Attached as Exhibit 3 is a true and correct copy of the transcript of the deposition of David Battany.

5. Attached as Exhibit 4 is a true and correct copy of the transcript of the deposition of Lauren Biehler.

6. Attached as Exhibit 5 is a true and correct copy of the transcript of the deposition of John Boland.

7. Attached as Exhibit 6 is a true and correct copy of the transcript of the deposition of Steve Brent.

8. Attached as Exhibit 7 is a true and correct copy of the transcript of the deposition of Ron Cannon.

9. Attached as Exhibit 8 is a true and correct copy of Transcript of Motion to Dismiss Oral Argument.

10. Attached as Exhibit 9 is a true and correct copy of the transcript of the deposition of Wade Comeaux.

11. Attached as Exhibit 10 is a true and correct copy of the transcript of the deposition of Merritt Connell.

12. Attached as Exhibit 11 is a true and correct copy of the transcript of the deposition of Charles Cowan.

13. Attached as Exhibit 12 is a true and correct copy of the transcript of the deposition of Charles Dickerson.

14. Attached as Exhibit 13 is a true and correct copy of the transcript of the deposition of John Forlines.

15. Attached as Exhibit 14 is a true and correct copy of the transcript of the deposition of Anson Gong.

16. Exhibit 15 is intentionally left blank.

17. Attached as Exhibit 16 is a true and correct copy of the transcript of the deposition of Anthony Ho.

18. Attached as Exhibit 17 is a true and correct copy of the transcript of the deposition of James Hunter.

19. Attached as Exhibit 18 is a true and correct copy of the transcript of the deposition of Javier Jaraba.

20. Attached as Exhibit 19 is a true and correct copy of the transcript of the deposition of Clifford Kitashima.

21. Attached as Exhibit 20 is a true and correct copy of the transcript of the deposition of Greg Lumsden.

22. Attached as Exhibit 21 is a true and correct copy of the transcript of the deposition of Rebecca Mairone.

23. Attached as Exhibit 22 is a true and correct copy of the transcript of the deposition of Edward O'Donnell.

24. Attached as Exhibit 23 is a true and correct copy of the transcript of the deposition of Pamela Padgett.

25. Attached as Exhibit 24 is a true and correct copy of the transcript of the deposition of Robert Price.

26. Attached as Exhibit 25 is a true and correct copy of the transcript of the deposition of David Sallis.

27. Attached as Exhibit 26 is a true and correct copy of the transcript of the deposition of Michael Sobczak.

28. Attached as Exhibit 27 is a true and correct copy of the transcript of the deposition of Fannie Mae 30(b)(6) representative Marianne Sullivan.

29. Attached as Exhibit 28 is a true and correct copy of the transcript of the deposition of Freddie Mac 30(b)(6) representative Benjamin Tanabe.

30. Attached as Exhibit 29 is a true and correct copy of the transcript of the deposition of Michael S. Thomas.

31. Attached as Exhibit 30 is a true and correct copy of the transcript of the deposition of Greg Togneri.

32. Attached as Exhibit 31 is a true and correct copy of the transcript of the deposition of Adela Zamarripa.

33. Attached as Exhibit 32 is a true and correct copy of the transcript of the deposition of Charles Grice.

34. Attached as Exhibit 33 is a true and correct copy of the transcript of the deposition of Daniel McFadden.

35. Attached as Exhibit 34 is a true and correct copy of the transcript of the deposition of Joseph Grimes.

36. Attached as Exhibit 35 is a true and correct copy of the transcript of the deposition of Theodore Chandler.

37. Exhibit 36 is intentionally left blank.

38. Exhibit 37 is intentionally left blank.

39. Exhibit 38 is intentionally left blank.

40. Exhibit 39 is intentionally left blank.

41. Attached as Exhibit 40 is a true and correct copy of a November 29, 1982 Executed FNMA Mortgage Selling and Servicing Contract.

42. Attached as Exhibit 41 is a true and correct copy of an October 31, 2005 Third Amended and Restated Strategic Alliance agreement between FNMA and Countrywide.

43. Attached as Exhibit 42 is a true and correct copy of an October 31, 2005 Letter from Todd Hempstead to David Specter regarding Third Amended and Restated Strategic Alliance Agreement.

44. Attached as Exhibit 43 is a true and correct copy of a March 8, 2006 email from Edward O'Donnell to Michael S. Thomas regarding CLUES information for Underwriters.

45. Attached as Exhibit 44 is a true and correct copy of an April 17, 2006 email from Edward O'Donnell to various recipients regarding draft Bulletin: Prime Clues Accept Validation Process.

46. Attached as Exhibit 45 is a true and correct copy of an April 13, 2006 Primary Prime Clues Accept Workflow.

47. Attached as Exhibit 46 is a true and correct copy of an October 2, 2006 Operations Workflow.

48. Attached as Exhibit 47 is a true and correct copy of a February 2, 2007 email.

49. Attached as Exhibit 48 is a true and correct copy of a February 7, 2003 excerpt from the Freddie Mac Single-Family Seller/Service Guide.

50. Attached as Exhibit 49 is a true and correct copy of a February 7, 2003 excerpt from the Freddie Mac Single-Family Seller/Service Guide.

51. Attached as Exhibit 50 is a true and correct copy of a September 30, 2008 Federal National Mortgage Association Form 10-Q.

52. Attached as Exhibit 51 is a true and correct copy of a February 23, 2007 Freddie Mac Bulletin number: 2007-1 to All Freddie Mac Sellers and Servicers.

53. Attached as Exhibit 52 is a true and correct copy of a March 31, 2007 Countrywide, Team LC Q1, 2007 Quarterly Business Review.

54. Attached as Exhibit 53 is a true and correct copy of an April 12, 2007 email regarding an April 11, 2007.

55. Attached as Exhibit 54 is a true and correct copy of an April 11, 2007 FSL Central Services Business Review.

56. Attached as Exhibit 55 is a true and correct copy of a May 7, 2007 email from Camilo Ramirez to various recipients regarding FSL - CMD Operation Model Comparison.

57. Attached as Exhibit 56 is a true and correct copy of a May 8, 2007 Central Underwriting PowerPoint Presentation prepared by Edward O'Donnell.

58. Attached as Exhibit 57 is a true and correct copy of a May 2007 Central Underwriting PowerPoint Presentation prepared by Edward O'Donnell.

59. Attached as Exhibit 58 is a true and correct copy of a May 15, 2007 Countrywide Home Loans, Inc. business relationship document.

60. Attached as Exhibit 59 is a true and correct copy of a June 15, 2007 Memorandum from Todd Hempstead and Ted Chandler to Dan Mudd.

61. Attached as Exhibit 60 is a true and correct copy of a July 18, 2007 email from Michael S. Thomas to various recipients regarding Prime workflow process improvement ideas.

62. Attached as Exhibit 61 is a true and correct copy of a July 18, 2007 PowerPoint presentation regarding the Prime High Speed Swim Lane.

63. Attached as Exhibit 62 is a true and correct copy of July 19, 2007 email from Michael S. Thomas to various recipients regarding Prime workflow process improvement ideas.

64. Attached as Exhibit 63 is a true and correct copy of a July 23, 2007 email from Rebecca Mairone to various recipients regarding the Fast Swim Lane.

65. Attached as Exhibit 64 is a true and correct copy of a July 30, 2007 email from Loren Rodriguez to various recipients regarding the HSSL Pilot.

66. Attached as Exhibit 65 is a true and correct copy of a July 31, 2007 email from Mark Barnett to various recipients regarding edits and perspective on the HSSL from QAC (Quality Assurance & Control) Group.

67. Attached as Exhibit 66 is a true and correct copy of an August 1, 2007 email from Loren Rodriguez to Edward O'Donnell regarding the HSSL Process Flow and Quality.

68. Attached as Exhibit 67 is a true and correct copy of an August 1, 2007 email from Edward O'Donnell to various recipients regarding Central Services Incentive Plans.

69. Attached as Exhibit 68 is a true and correct copy of an August 3, 2007 email from James White to Edward O'Donnell regarding Central Services Incentive Plans.

70. Attached as Exhibit 69 is a true and correct copy of an August 7, 2007 email from James White to Edward O'Donnell regarding Prime HSSL Walkthrough.

71. Attached as Exhibit 70 is a true and correct copy of a July 26, 2007 Prime High Speed Swim Lane Design Review PowerPoint presentation.

72. Attached as Exhibit 71 is a true and correct copy of an August 8, 2007 email from Edward O'Donnell to various recipients regarding loan parameters.

73. Attached as Exhibit 72 is a true and correct copy of an August 8, 2007 email from Michael S. Thomas to Edward O'Donnell regarding a July 23, 2007 PowerPoint presentation on FSL CMD Ops Comparison Findings.

74. Attached as Exhibit 73 is a true and correct copy of an attachment to an August 8, 2007 email from Michael S. Thomas to Edward O'Donnell regarding an FSL / CMD Ops Comparison.

75. Attached as Exhibit 74 is a true and correct copy of an August 13, 2007 email from Edward O'Donnell to various recipients regarding draft proposal on Condition Authority and HSSL pilot comp adjustments.

76. Attached as Exhibit 75 is a true and correct copy of an August 13, 2007 email from Edward O'Donnell to various recipients regarding ideas to expedite funding process.

77. Attached as Exhibit 76 is a true and correct copy of an August 13, 2007 email from Edward O'Donnell to Loren Rodriguez discussing meeting notes from an HSSL Central Services Review.

78. Attached as Exhibit 77 is a true and correct copy of an August 14, 2007 Flowchart outlining various stages of the High Speed Swim Lane.

79. Attached as Exhibit 78 is a true and correct copy of an August 14, 2007 Staffing roster for the Richardson and Chandler offices.

80. Attached as Exhibit 79 is a true and correct copy of an August 15, 2007 email from Loren Rodriguez to various recipients discussing meeting notes from an HSSL Central Services Review on August 9, 2007.

81. Attached as Exhibit 80 is a true and correct copy of an August 16, 2007 email from Edward O'Donnell to various recipients discussing draft HSSL authority levels.

82. Attached as Exhibit 81 is a true and correct copy of an August 20, 2007 NSC and NCA HSSL Organizational Overview.

83. Attached as Exhibit 82 is a true and correct copy of an August 21, 2007 email from Edward O'Donnell to various recipients regarding a plan to expand the HSSL concept.

84. Attached as Exhibit 83 is a true and correct copy of an August 23, 2007 transmittal letter regarding the Fannie Mae Single Family/2007 Selling Guide.

85. Attached as Exhibit 84 is a true and correct copy of an August 27, 2007 High Speed Swim Lane Project Update PowerPoint presentation.

86. Attached as Exhibit 85 is a true and correct copy of an August 28, 2007 Fannie Mae Loan Level Notes.

87. Attached as Exhibit 86 is a true and correct copy of an August 30, 2007 email from Patrick Aliano to various recipients regarding underwriting challenges and subprime changes.

88. Attached as Exhibit 87 is a true and correct copy of an August 31, 2007 email from Patrick Aliano to various recipients regarding HSSL.

89. Attached as Exhibit 88 is a true and correct copy of a September 5, 2007 email from Michael S. Thomas to various recipients regarding the business logic for estimating the number of core underwriters on HSSL team.

90. Attached as Exhibit 89 is a true and correct copy of a September 6, 2007 email from Anson Gong to various recipients regarding HSSL Quality Assurance Review.

91. Attached as Exhibit 90 is a true and correct copy of a September 10, 2007 email from Edward O'Donnell to Cliff Kitashima regarding Central Fulfillment.

92. Attached as Exhibit 91 is a true and correct copy of a September 10, 2007 FSL Central Fulfillment organizational chart.

93. Attached as Exhibit 92 is a true and correct copy of a September 11, 2007 handwritten notes from Lauren Biehler from the AMO review FSL presentation.

94. Attached as Exhibit 93 is a true and correct copy of a September 12, 2007 FHLMC/Due Diligence On-Site Review PowerPoint presentation.

95. Attached as Exhibit 94 is a true and correct copy of a September 12, 2007 Countrywide FHLMC Subprime Review of Full Spectrum Lending PowerPoint presentation.

96. Attached as Exhibit 95 is a true and correct copy of a September 26, 2007 NSC Centralized Fulfillment PowerPoint presentation.

97. Attached as Exhibit 96 is a true and correct copy of a September 26, 2007 High Speed Swim Lane Audit Review Process QA results as of 08/31/07.

98. Attached as Exhibit 97 is a true and correct copy of a September 26, 2007 Central Fulfillment summary of training.

99. Attached as Exhibit 98 is a true and correct copy of a September 26, 2007 email from Anson Gong to various recipients regarding Centralized Fulfillment town hall meeting and team rosters.

100. Attached as Exhibit 99 is a true and correct copy of an attachment to a September 26, 2007 email from Anson Gong to various recipients regarding Central Fulfillment Chandler team roster.

101. Attached as Exhibit 100 is a true and correct copy of an attachment to a September 26, 2007 email from Anson Gong to various recipients regarding Central Fulfillment Richardson team roster.

102. Attached as Exhibit 101 is a true and correct copy of an attachment to a September 26, 2007 email from Anson Gong to various recipients regarding Central Fulfillment Rosemead team roster.

103. Attached as Exhibit 102 is a true and correct copy of a September 27, 2007 NSC Central Fulfillment Update PowerPoint presentation.

104. Attached as Exhibit 103 is a true and correct copy of an October 2, 2007 New NSC Central Fulfillment Model bulletin.

105. Attached as Exhibit 104 is a true and correct copy of an October 2, 2007 NSC Central Fulfillment Production Update PowerPoint presentation.

106. Attached as Exhibit 105 is a true and correct copy of an October 2, 2007 Condition Sign-Off Authority Levels chart.

107. Attached as Exhibit 106 is a true and correct copy of an October 2, 2007 Condition Sign-Off (CSO) and Underwriting Training Matrix.

108. Attached as Exhibit 107 is a true and correct copy of an October 4, 2007 FSLD Underwriter Approval Authority Level Matrix.

109. Attached as Exhibit 108 is a true and correct copy of an October 4, 2007 email from Don Harris to various recipients regarding HSSL weekly review summary.

110. Attached as Exhibit 109 is a true and correct copy of an October 5, 2007 email from Greg Lumsden to various recipients regarding FSL's new processing model.

111. Attached as Exhibit 110 is a true and correct copy of an October 16, 2007 email from Brian Dupree to various recipients regarding review results.

112. Attached as Exhibit 111 is a true and correct copy of an October 24, 2007 email from Wade Comeaux to various recipients regarding Central Fulfillment.

113. Attached as Exhibit 112 is a true and correct copy of an August 2008 FSL Central Fulfillment - Field_NSC Cost Center Alignment chart.

114. Attached as Exhibit 113 is a true and correct copy of November 2, 2007 Quality Assurance Review Process on Central Fulfillment Loans Bulletin.

115. Attached as Exhibit 114 is a true and correct copy of a November 2, 2007 email to various recipients regarding notes and additional documents from CMD ROC visits.

116. Attached as Exhibit 115 is a true and correct copy of a November 2, 2007 ROC Workshop Workflow Roles & Responsibilities PowerPoint presentation.

117. Attached as Exhibit 116 is a true and correct copy of a November 7, 2007 Central Fulfillment (CF) Authority Training.

118. Attached as Exhibit 117 is a true and correct copy of a November 9, 2007 Quality Assurance Reviews at Phase Code 4 on Central Fulfillment Loans - Loan Manufacturing Quality.

119. Attached as Exhibit 118 is a true and correct copy of a November 13, 2007 New Fulfillment Model PowerPoint presentation.

120. Exhibit 119 is intentionally left blank.

121. Attached as Exhibit 120 is a true and correct copy of a November 14, 2007 email to various recipients regarding AMO.

122. Attached as Exhibit 121 is a true and correct copy of April 23, 2008 email from Javier Jaraba regarding QC audits.

123. Attached as Exhibit 122 is a true and correct copy of a November 15, 2007 memorandum from Kathryn Gillia to various recipients regarding External Operational Risk On-Site Review Countrywide Home Loans.

124. Exhibit 123 is intentionally left blank.

125. Attached as Exhibit 124 is a true and correct copy of a November 15, 2007 email regarding Countrywide Proposal.

126. Attached as Exhibit 125 is a true and correct copy of a November 19, 2007 email from Steve Brent to Javier Jaraba regarding Rosemead site visit report.

127. Attached as Exhibit 126 is a true and correct copy of a November 29, 2007 email from Cliff Kitashima to Rebecca Mairone regarding changes to Draft of Central Fulfillment operations protocol.

128. Attached as Exhibit 127 is a true and correct copy of a November 30, 2007 FSL Bulletin 07-601.

129. Attached as Exhibit 128 is a true and correct copy of a November 30, 2007 email from Ron Cannon to various recipients regarding recommendations for changes to UW2 Authority of various employees.

130. Attached as Exhibit 129 is a true and correct copy of a November 30, 2007 email from Ron Cannon to various recipients regarding UW authority.

131. Attached as Exhibit 130 is a true and correct copy of a November 30, 2007 email from Rebecca Mairone to various recipients regarding changes to the Central Fulfillment originating process.

132. Attached as Exhibit 131 is a true and correct copy of a November 30, 2007 Countrywide Credit Briefing document.

133. Attached as Exhibit 132 is a true and correct copy of a December 4, 2007 FSL Bulletin 07-607.

134. Attached as Exhibit 133 is a true and correct copy of a December 4, 2007 email from Steve Brent to various recipients regarding CF weekly QA findings.

135. Attached as Exhibit 134 is a true and correct copy of a December 5, 2007 email from Steve Brent to various recipients regarding PC3 reviews.

136. Attached as Exhibit 135 is a true and correct copy of a December 4, 2007 chart regarding QA/QC.

137. Attached as Exhibit 136 is a true and correct copy of a FSL Central Fulfillment – Field NCA Cost Center Alignment chart.

138. Attached as Exhibit 137 is a true and correct copy of a December 10, 2007 Bulletin 07-617.

139. Attached as Exhibit 138 is a true and correct copy of a December 10, 2007 email from Rebecca Mairone to Steve Brent regarding Central Fulfillment.

140. Attached as Exhibit 139 is a true and correct copy of a December 10, 2007 email from Rebecca Mairone to various recipients regarding Central Fulfillment.

141. Attached as Exhibit 140 is a true and correct copy of a December 10, 2007 CMD Underwriter Review.

142. Attached as Exhibit 141 is a true and correct copy of a December 11, 2007 email from Edward O'Donnell to Cliff Kitashima regarding FSL QA/QC Efforts.

143. Attached as Exhibit 142 is a true and correct copy of a December 12, 2007 email from Loren Rodriguez to Rebecca Mairone.

144. Attached as Exhibit 143 is a true and correct copy of a December 12, 2007 email from Edward O'Donnell to various recipients regarding FSL Operations.

145. Attached as Exhibit 144 is a true and correct copy of a December 12, 2007 FSLD Communications Operations Bulletin 07-624.

146. Attached as Exhibit 145 is a true and correct copy of a December 13, 2007 email from Loren Rodriguez to Rebecca Mairone.

147. Attached as Exhibit 146 is a true and correct copy of a December 13, 2007 minutes from the NSC Central Fulfillment Project Meeting.

148. Attached as Exhibit 147 is a true and correct copy of January 4, 2008 Fannie Mae Mortgage Selling and Servicing Contract.

149. Attached as Exhibit 148 is a true and correct copy of a December 13, 2007 Site Review of Full Spectrum Lending.

150. Attached as Exhibit 149 is a true and correct copy of a December 14, 2007 email from Steve Brent to various recipients regarding Central Fulfillment.

151. Attached as Exhibit 150 is a true and correct copy of a December 14, 2007 email from Rebecca Mairone to Steve Brent regarding QA results and CF's remediation plan.

152. Attached as Exhibit 151 is a true and correct copy of a December 14, 2007 email from Rebecca Mairone to various recipients regarding QA/QC Findings.

153. Attached as Exhibit 152 is a true and correct copy of a December 14, 2007 PowerPoint presentation.

154. Attached as Exhibit 153 is a true and correct copy of a December 27, 2007 email regarding Countrywide ORC Review Report.

155. Attached as Exhibit 154 is a true and correct copy of a January 23, 2008 Agenda for Quality Control and Assurance Summit in Richardson, TX.

156. Attached as Exhibit 155 is a true and correct copy of a January 23, 2008 QA/QC Communication Grid.

157. Attached as Exhibit 156 is a true and correct copy of a January 26, 2008 email from Steve Brent to various recipients regarding a summary of Takeaways and Comments from Credit Summit.

158. Attached as Exhibit 157 is a true and correct copy of January 30, 2008 Loan Performance and Quality Review PowerPoint Presentation.

159. Attached as Exhibit 158 is a true and correct copy of a January 31, 2008 Excerpt of Federal National Mortgage Association Form 10-K for the fiscal year ended December 31, 2007.

160. Attached as Exhibit 159 is a true and correct copy of a January 2008 Excerpt of Federal Home Loan Mortgage Corporation 2007 Annual Report.

161. Attached as Exhibit 160 is a true and correct copy of a February 2008 Quality Control Ratings - Loan Performance and Quality Review Improvement Plan PowerPoint presentation.

162. Attached as Exhibit 161 is a true and correct copy of a February 6, 2008 email from Don Harris to various recipients regarding QA PreFunding Monthly Review.

163. Attached as Exhibit 162 is a true and correct copy of a March 3, 2008 email from Edward O'Donnell to various recipients regarding Draft Loan Manufacturing Quality Memo.

164. Attached as Exhibit 163 is a true and correct copy of a March 3, 2008 email from Greg Lumsden to Celia Coulter regarding QC & QA.

165. Attached as Exhibit 164 is a true and correct copy of attachment to a March 3, 2008 email from Greg Lumsden to Celia Coulter regarding a March 3, 2008 Quality Update Power Point presentation.

166. Attached as Exhibit 165 is a true and correct copy of March 4, 2008 email from Greg Lumsden to Andrew Gissinger regarding QC & QA.

167. Attached as Exhibit 166 is a true and correct copy of a March 5, 2008 email from Greg Lumsden to various recipients regarding quality.

168. Attached as Exhibit 167 is a true and correct copy of a March 6, 2008 email from Greg Lumsden regarding Stated/Reduced Doc Process Enhancements.

169. Attached as Exhibit 168 is a true and correct copy of a March 17, 2008 report regarding - FSL Loan Performance and Quality Review.

170. Attached as Exhibit 169 is a true and correct copy of a March 18, 2008 email from Edward O'Donnell to Patrick Aliano regarding Guideline Change Discussion.

171. Attached as Exhibit 170 is a true and correct copy of a March 18, 2008 email from Greg Lumsden regarding QC Stats and Effort.

172. Attached as Exhibit 171 is a true and correct copy of a March 21, 2008 email from Cliff Kitashima to various recipients regarding QC.

173. Attached as Exhibit 172 is a true and correct copy of an April 15, 2008 Report to Congress.

174. Attached as Exhibit 173 is a true and correct copy of an April 23, 2008 email from Wade Comeaux to various recipients regarding quality.

175. Attached as Exhibit 174 is a true and correct copy of an April 24, 2008 Manufacturing Quality Initiatives PowerPoint presentation.

176. Attached as Exhibit 175 is a true and correct copy of an April 25, 2008 Bulletin 08-195 titled.

177. Attached as Exhibit 176 is a true and correct copy of a May 13, 2008 email from Cliff Kitashima regarding status update.

178. Attached as Exhibit 177 is a true and correct copy of a May 14, 2008 email chain between Michael S. Thomas and Edward O'Donnell.

179. Attached as Exhibit 178 is a true and correct copy of a May 15, 2008 email from Patrick Aliano to various recipients regarding CLUES runs and Reduced Document Income Comparison Weekly Summary.

180. Attached as Exhibit 179 is a true and correct copy of a May 15, 2008 email from Edward O'Donnell to Michael S. Thomas.

181. Attached as Exhibit 180 is a true and correct copy of a May 16, 2008 email from Michael S. Thomas to various recipients regarding Q1 2008 Sprint Incentive plan.

182. Attached as Exhibit 181 is a true and correct copy of a May 16, 2008 email from Natalie Sanchez to various recipients regarding Wade Comeaux's quality improvement plan.

183. Attached as Exhibit 182 is a true and correct copy of a May 21, 2008 Bulletin 08-237 titled, "New CTC Approval Process for Field Offices and Central Fulfillment".

184. Attached as Exhibit 183 is a true and correct copy of a May 29, 2008 email from Steve Brent to various recipients regarding Q1 2008 Sprint Incentive plan.

185. Attached as Exhibit 184 is a true and correct copy of a June 9, 2008 email from Wade Comeaux to Rebecca Mairone regarding FSL Divisional QC comparison.

186. Attached as Exhibit 185 is a true and correct copy of a June 13, 2008 Bulletin 08-299 titled, "Stated Doc Income Reasonability Review Must Be Completed by SLD".

187. Attached as Exhibit 186 is a true and correct copy of a June 20, 2008 email from Javier Jaraba to Cliff Kitashima regarding June 12, 2008 loans with greater than 15 AUS runs.

188. Attached as Exhibit 187 is a true and correct copy of a June 24, 2008 email from Steve Brent to various recipients regarding the QC Incentive Plan.

189. Attached as Exhibit 188 is a true and correct copy of a June 30, 2008 Form 10-Q Federal National Mortgage Association for the quarterly period ended June 30, 2008.

190. Attached as Exhibit 189 is a true and correct copy of a July 7, 2008 email from Wade Comeaux to Rebecca Mairone regarding CQC.

191. Attached as Exhibit 190 is a true and correct copy of July 7, 2007 charts.

192. Attached as Exhibit 191 is a true and correct copy of a July 31, 2008 Alert & Advice bulletin 08-015 regarding manipulation of CLUES data and Excessive CLUES runs.

193. Attached as Exhibit 192 is a true and correct copy of an August 2008 FSL Central Fulfillment - Field_NSC Cost Center Alignment Chart.

194. Attached as Exhibit 193 is a true and correct copy of an August 6, 2008 Form 10-Q Federal Home Loan Mortgage Corp - FMCC filed August 06, 2008 (period: June 30, 2008).

195. Attached as Exhibit 194 is a true and correct copy of a September 6, 2008 Memorandum from Christopher H. Dickerson to James B. Lockhart III regarding Proposed Appointment of the Federal Housing Financing Agency as Conservator for the Federal Home Loan Mortgage Corporation.

196. Attached as Exhibit 195 is a true and correct copy of a September 6, 2008 Memorandum from Christopher H. Dickerson to James B. Lockhart III regarding Proposed Appointment of the Federal Housing Financing Agency as Conservator for the Federal National Mortgage Association.

197. Attached as Exhibit 196 is a true and correct copy of a September 23, 2008 Statement of James B. Lockhart III Before the Senate Committee on Banking, Housing, and Urban Affairs on the Appointment of FHFA as Conservator for Fannie Mae and Freddie Mac.

198. Attached as Exhibit 197 is a true and correct copy of a November 6, 2008 Asset Contribution Indemnification Agreement.

199. Attached as Exhibit 198 is a true and correct copy of a January 12, 2009 email from Edward O'Donnell to Michael S. Thomas regarding the Random Quality Audit between the different divisions.

200. Attached as Exhibit 199 is a true and correct copy of a January 12, 2009 email from Edward O'Donnell to Michael S. Thomas regarding the Random Quality Audit between the different divisions.

201. Attached as Exhibit 200 is a true and correct copy of a January 5, 2009 Excel Spreadsheet regarding QC Random Audits Results.

202. Attached as Exhibit 201 is a true and correct copy of June 9, 2009 Asset Contribution Indemnification Agreement.

203. Attached as Exhibit 202 is a true and correct copy of a June 16, 2010 CoreLogic RealQuest Professional Property Detail report.

204. Attached as Exhibit 203 is a true and correct copy of a January 2011 the Report of the National Commission on the Causes of the Financial and Economic Crisis.

205. Attached as Exhibit 204 is a true and correct copy of a June 30, 2008 Asset Contribution Indemnification Agreement.

206. Attached as Exhibit 205 is a true and correct copy of a September 12, 2011 Single Family Five Year Execution Strategy.

207. Attached as Exhibit 206 is a true and correct copy of a September 12, 2007 email from Cindy Simantel to various recipients regarding a FHLMC Presentation - Full Spectrum.

208. Attached as Exhibit 207 is a true and correct copy of a September 26, 2007 email from Javier Jaraba to various recipients regarding an upcoming GL Central Fulfillment Review.

209. Attached as Exhibit 208 is a true and correct copy of an October 30, 2007 email from Michael S. Thomas to Edward O'Donnell regarding the LS/UW - Level 1 Authority File Review Process.

210. Attached as Exhibit 209 is a true and correct copy of February 9, 2007 Master Agreement No. ML02561 VAR TOC-1, Amendment No. 3.

211. Attached as Exhibit 210 is a true and correct copy of an October 2, 2007 CF Process Map.

212. Attached as Exhibit 211 is a true and correct copy of a July 25, 2008 FSL QC Results Trend.

213. Attached as Exhibit 212 is a true and correct copy of a February 26, 2009 Fannie Mae Annual Form 10-K.

214. Attached as Exhibit 213 is a true and correct copy of a March 11, 2009 FHLMC Annual Form 10-K.

215. Attached as Exhibit 214 is a true and correct copy of a March 31, 2008 Countrywide Financial Quarterly Report Form 10-Q.

216. Attached as Exhibit 215 is a true and correct copy of a February 29, 2008 Countrywide Financial Annual Report Form 10-K.

217. Attached as Exhibit 216 is a true and correct copy of a July 19, 2007 email from Michael S. Thomas to various recipients regarding Process Improvement Ideas.

218. Attached as Exhibit 217 is a true and correct copy of a May 1, 2008 QC Division Response, Final Ratings, & Escalation Procedures.

219. Attached as Exhibit 218 is a true and correct copy of January 17, 2008 email from Cliff Kitashima to Edward O'Donnell regarding QA audits.

220. Attached as Exhibit 219 is a true and correct copy of diagrams and charts regarding the Prime High Speed Swim Lane - Design Concept.

221. Attached as Exhibit 220 is a true and correct copy of a July 20, 2007 email from Rebecca Mairone to Greg Lumsden regarding Fast Swim Lane.

222. Attached as Exhibit 221 is a true and correct copy of an August 3, 2007 email from Rebecca Mairone to Cliff Kitashima regarding Central Services Incentive Memo.

223. Attached as Exhibit 222 is a true and correct copy of an August 3, 2007 from Rebecca Mairone to Cliff Kitashima regarding Central Services Incentive Memo and the path for the prime process.

224. Attached as Exhibit 223 is a true and correct copy of an August 9, 2007 email from Loren Rodriguez to various recipients regarding a Memorandum to Countrywide Home Loan Employees.

225. Attached as Exhibit 224 is a true and correct copy of an August 24, 2007 email from Michael S. Thomas to various recipients regarding a HSSL procedural change.

226. Attached as Exhibit 225 is a true and correct copy of a September 21, 2007 email from Rebecca Mairone to various recipients regarding HSSL Pilot Analysis.

227. Attached as Exhibit 226 is a true and correct copy of a November 1, 2007 email from Wade Comeaux to various recipients regarding Operations Bulletin: New Title Review Checklist Required for PCA and Central Fulfillment Underwriting Levels One and Two.

228. Attached as Exhibit 227 is a true and correct copy of a November 16, 2007 email from Scott Bridges to various recipients regarding Rosemead visit.

229. Attached as Exhibit 228 is a true and correct copy of a November 30, 2007 email from Steve Brent to various recipients regarding Central Fulfillment.

230. Attached as Exhibit 229 is a true and correct copy of a March 13, 2008 email from Michael S. Thomas to various recipients regarding Loan Performance.

231. Attached as Exhibit 230 is a true and correct copy of a May 20, 2008 FSL Quality Bi-Weekly Review PowerPoint presentation.

232. Attached as Exhibit 231 is a true and correct copy of a May 28, 2008 email from Greg Lumsden to Andrew Gissinger.

233. Attached as Exhibit 232 is a true and correct copy of an April 28, 2008 email from Loren Rodriguez to various recipients regarding an attached "Big 5" Quality Initiative slide deck.

234. Attached as Exhibit 233 is a true and correct copy of a May 17, 2013 U.S v. Bank of America Corp. et al., 12 Civ. 1422 (JSR) Plaintiff's Responses to Rebecca Mairone's First Set of Interrogatories.

235. Attached as Exhibit 234 is a true and correct copy of a July 2, 2007 email from Edward O'Donnell to various recipients regarding central services organization changes.

236. Attached as Exhibit 235 is a true and correct copy of a November 29, 2007 email from Rebecca Mairone to various recipients regarding central fulfillment management team notice.

237. Attached as Exhibit 236 is a true and correct copy of a March 24, 2008 email from Edward O'Donnell to various recipients regarding manufacturing quality summit agenda/approach.

238. Attached as Exhibit 237 is a true and correct copy of an October 14, 2008 Comprehensive Risk Assessment Approach to Manual Underwriting.

239. Attached as Exhibit 238 is a true and correct copy of a September 10, 2007 HSSL Process PowerPoint.

240. Attached as Exhibit 239 is a true and correct copy of a November 12, 2007 email from Rebecca Mairone to Wade Comeaux.

241. Attached as Exhibit 240 is a true and correct copy of a November 13, 2007 email from Don Harris to Steve Brent regarding central fulfillment QA.

242. Attached as Exhibit 241 is a true and correct copy of a February 6, 2008 email from John Boland to Robert Price regarding QA.

243. Attached as Exhibit 242 is a true and correct copy of an October 2007 central fulfillment results quality assurance phase code 3 PowerPoint.

244. Attached as Exhibit 243 is a true and correct copy of an October 2007 central fulfillment findings PowerPoint.

245. Attached as Exhibit 244 is a true and correct copy of an October 2007 central fulfillment findings "QA PC3" PowerPoint.

246. Attached as Exhibit 245 is a true and correct copy of an August 1, 2007 Information Bulletin.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: Washington, DC
July 16, 2013

s/Enu A. Mainigi
Enu A. Mainigi (*pro hac vice*)

CERTIFICATE OF SERVICE

I hereby certify that, on this 16th day of July, 2013, the foregoing Declaration of Enu A. Mainigi and exhibits annexed thereto in support of Defendants' Memorandum In Support of Motion for Summary Judgment were filed with the Court through the CM/ECF system. I also certify that the foregoing were served via electronic mail FTP on the following counsel:

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